

**IN THE WESTERN DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI - ST. JOSEPH DIVISION**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 15-06004-01-17-CR-SJ-DGK
	)	
JOSHUA KEITH BOWERS, et al.	)	
	)	
Defendants.	)	

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**DEFENDANT'S MOTION REQUESTING A DETENTION HEARING**

COMES NOW, Defendant Jason Lee Kirtley through his attorney of record, Nicole Forsythe, and asks the Court to set a detention hearing in the above-captioned matter. Defendant was arrested on federal charges on August 12, 2015 while he was returning to state custody for a violation of his state probation. This Court ordered that he return to state custody on October 20, 2015. Defendant has served his state sentence and last week was returned to federal custody.

Defendant will return to the Court as ordered and does not pose a danger to society. Therefore, Defendant respectfully requests that the Court set a hearing to determine his eligibility for pre-trial release as soon as possible.

On the 14<sup>th</sup> Day of February 2017.

Respectfully submitted,

/s/Nicole Forsythe

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was delivered on February 14, 2017 to the CM/ECF system of the United States District Court for the Western District of Missouri for electronic delivery to all counsel of record.

/s/Nicole Forsythe